

SEALED

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

United States of America

v.

ROBERT EARL TALBOTT*Defendant***DNM: 25-204 MJ**Case No. **3:25-MJ-088-BT****ARREST WARRANT**

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) ROBERT TALBOTT,

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § Stalking
 2261A(2)

Date: 02/03/2025 2:00 pmCity and state: Dallas, Texas

*Issuing officer's signature*

REBECCA RUTHERFORD, U.S. Magistrate Judge

*Printed name and title***Return**

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

*Arresting officer's signature**Printed name and title*

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

February 3, 2025

KAREN MITCHELL

**CLERK, U.S. DISTRICT
COURT**

United States of America
v.

ROBERT EARL TALBOTT

Case No.

3:25-MJ-088-BT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2024 through January 30, 2025 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. § 2261A(2)

Offense Description

Stalking

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Daniel Berardicurti.

☒ Continued on the attached sheet.

[Signature]

Complainant's signature

Special Agent Daniel Berardicurti

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: February 3, 2025

[Signature]

Judge's signature



City and state: Dallas, Texas

REBECCA RUTHERFORD, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Daniel Berardicurti, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since January 2019. I am currently assigned to the Dallas Field Office. Since joining the FBI, I have investigated violations of federal law, to include federal violations concerning assaults and stalking. I have gained experience through training classes and work conducting these types of investigations. More specifically, I have conducted these types of investigations both on the state level as a former police officer, and also in my roles as an FBI Special Agent while working in Indian Country and in my current role as an FBI Special Agent working on the Dallas Violent Crimes Task Force. In my role as a Special Agent, I have authored numerous search warrants and authored complaints related to these investigations. Further, as a federal agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

2. This affidavit is made in support of a criminal complaint charging **Robert Earl Talbott** (hereinafter "Talbott") with a violation of 18 U.S.C. § 2261A(2) (Stalking). Title 18, United States Code, Section 2261A(2) provides:

Whoever—

(2) with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, uses the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any

other facility of interstate or foreign commerce to engage in a course of conduct that—

(A) places that person in reasonable fear of the death of or serious bodily injury to a person, a pet, a service animal, an emotional support animal, or a horse described in clause (i), (ii), (iii), or (iv) of paragraph (1)(A); or

(B) causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person described in clause (i), (ii), or (iii), of paragraph (1)(A),

shall be punished as provided in section 2261(b) or section 2261B, as the case may be.

3. The facts and information contained in this affidavit are based upon my direct participation in this investigation and based upon facts as relayed to me by other law enforcement officers pertaining to this investigation. This affidavit is submitted for the limited purpose of establishing probable cause for the charged offense. As a result, I have not included each and every fact known to me concerning this investigation.

PROBABLE CAUSE

4. On or about December 23, 2024, A.T. made a report to the FBI National Threat Operations Center (“NTOC”) regarding threatening communications sent to her from her husband, **Robert Earl Talbott**, via a phone number ending in 1997. These messages were sent via a facility of interstate commerce to A.T., who resides in Garland, Texas.

5. More specifically, A.T. stated that **Talbott** began threatening her in October 2024 after she obtained a protective order against **Talbott**. However, A.T. later learned the protective order was not served on **Talbott**. A.T. stated **Talbott** sent text

messages to his sister to tell A.T. he was going to murder her. **Talbott** sent A.T. a text message stating “Get your affairs in order cunt this was the last straw. You’ve got two weeks to live due to travel, make them count.”

6. On or about January 14, 2025, I obtained a copy of police reports from the Garland Police Department (“GPD”) filed by A.T. concerning **Talbott’s** threatening communications. The following is a summary of the reports filed with GPD:

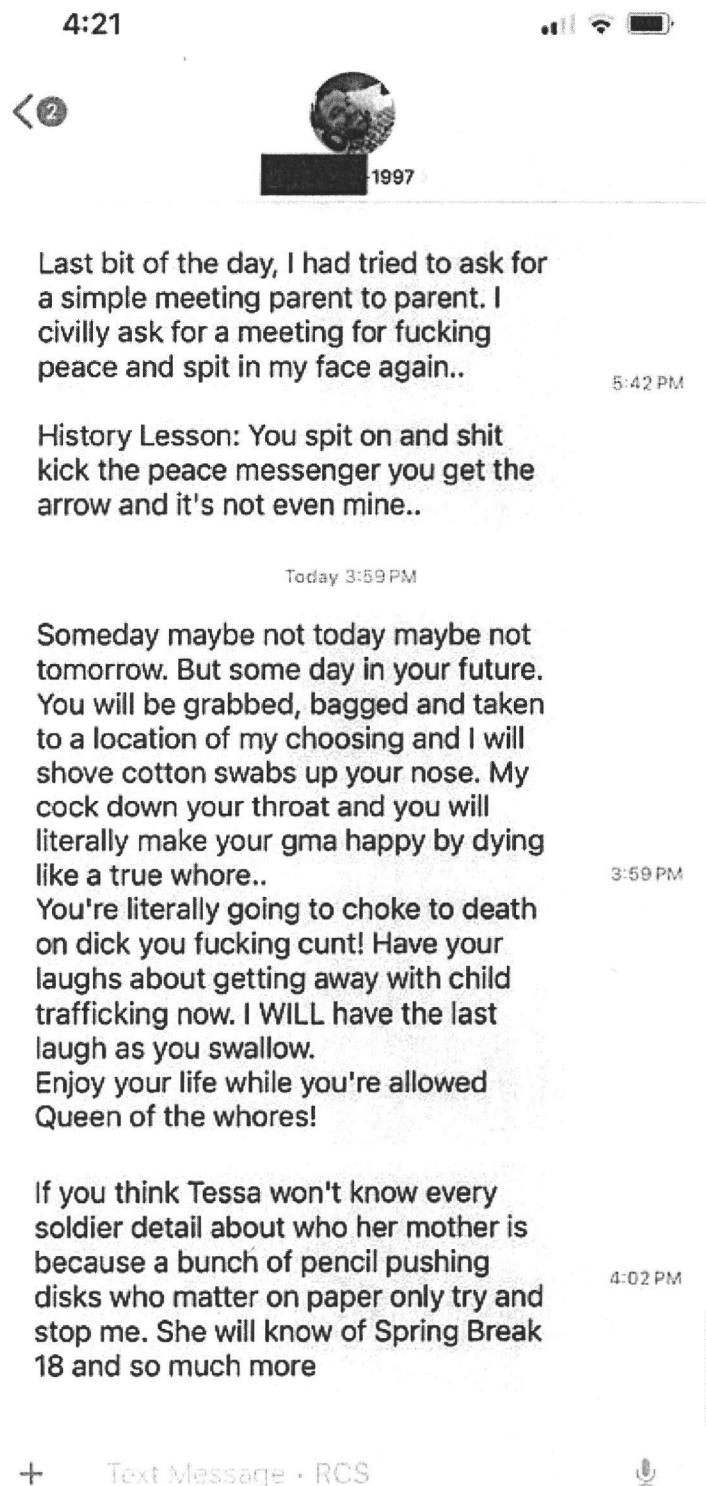
- a) In a report dated May 14, 2024, A.T. stated **Talbott** sent A.T. eight text messages telling her to kill herself.
- b) In a report dated August 6, 2024, A.T. stated **Talbott** sent her messages to kill herself.
- c) In a report dated September 27, 2024, A.T. stated **Talbott** sent her a message stating, “paper doesn’t stop a bullet cunt and I know where you live.” **Talbott** also sent her a message stating, “in case you think I’m bluffing like last time...sleep with one eye open.” **Talbott** sent her the address for both A.T.’s residence and workplace.
- d) In a report dated November 5, 2024, A.T. stated **Talbott’s** sister sent A.T. a text message from **Talbott** stating, “Tell your bestie [A.T.] im coming to kill her stat.”
- e) In a report dated December 3, 2024, A.T. stated she received numerous threatening text messages from **Talbott**. One such message in the report stated, “I don’t know when but one day, you will be grabbed and a bag put over your head. You will be taken to a location of my choosing, with cotton swabs up your nose

and my cock down your throat. You will make your grandma happy by dying like a true whore.” A.T. also showed GPD officers a copy of a protective order she had obtained against **Talbott** (DF-23-15828).

i) In a report dated December 17, 2024, A.T. stated that she received a text message from **Talbott**, which she believed to be a violation of the protective order she obtained against **Talbott**. On or about that same date, or shortly thereafter, A.T. learned that the protective order had not been served on **Talbott**. The protective order was subsequently served on **Talbott** on or about December 21, 2024.

7. On January 16, 2025, GPD Lieutenant Hall provided me with a copy of A.T.’s protective order and the text messages she provided to GPD. The below image was a message saved on or about December 3, 2024, provided by A.T.:

[the remainder of this page left intentionally blank]



8. On January 16, 2025, I conducted an open-source check on the phone number ending in 1997. The phone number was registered to **Talbott**.

9. On January 29, 2025, I interviewed A.T. Through my interview, I learned that **Talbott** began sending A.T. text messages threatening to kill himself on Superbowl Sunday 2024 while he had their daughter. He also sent A.T. a message threatening to shoot his attorney.

10. A.T. said **Talbott** began sending A.T. text messages in May 2024 stating that he was going to get her ex-boyfriend to “get her.” **Talbott** also told A.T. her ex-boyfriend should have slit her throat when he had the chance.

11. A.T. said **Talbott** began sending her death threats in October 2024. In December 2024, A.T.’s attorney instructed A.T. and her daughter to flee to the Houston area in response to **Talbott**’s messages.

12. A.T. also provided voicemails from **Talbott**. A summary of the voicemails is below:

a) **Talbott** says he has just crossed state lines and is going to enjoy taking every piece of flesh off of A.T.’s bones and feeding it to her.

b) **Talbott** says A.T. better not be at work or she will miss time to pack and get their daughter out before he kills A.T. in front of their daughter.

c) **Talbott** says A.T. will not be able to come to her phone after he breaks her kneecaps and slits her wrists.

d) **Talbott** says A.T. cannot come to the phone because he has not bashed in her skull yet and he is going to kill her.

e) **Talbott** says he hopes A.T. has enjoyed her job because it will probably be what runs through her mind when he bashes her skull in. **Talbott** says he is either going to rape her to death or bash her skull in. **Talbott** says he is coming to Texas right now and A.T. is going to die slowly.

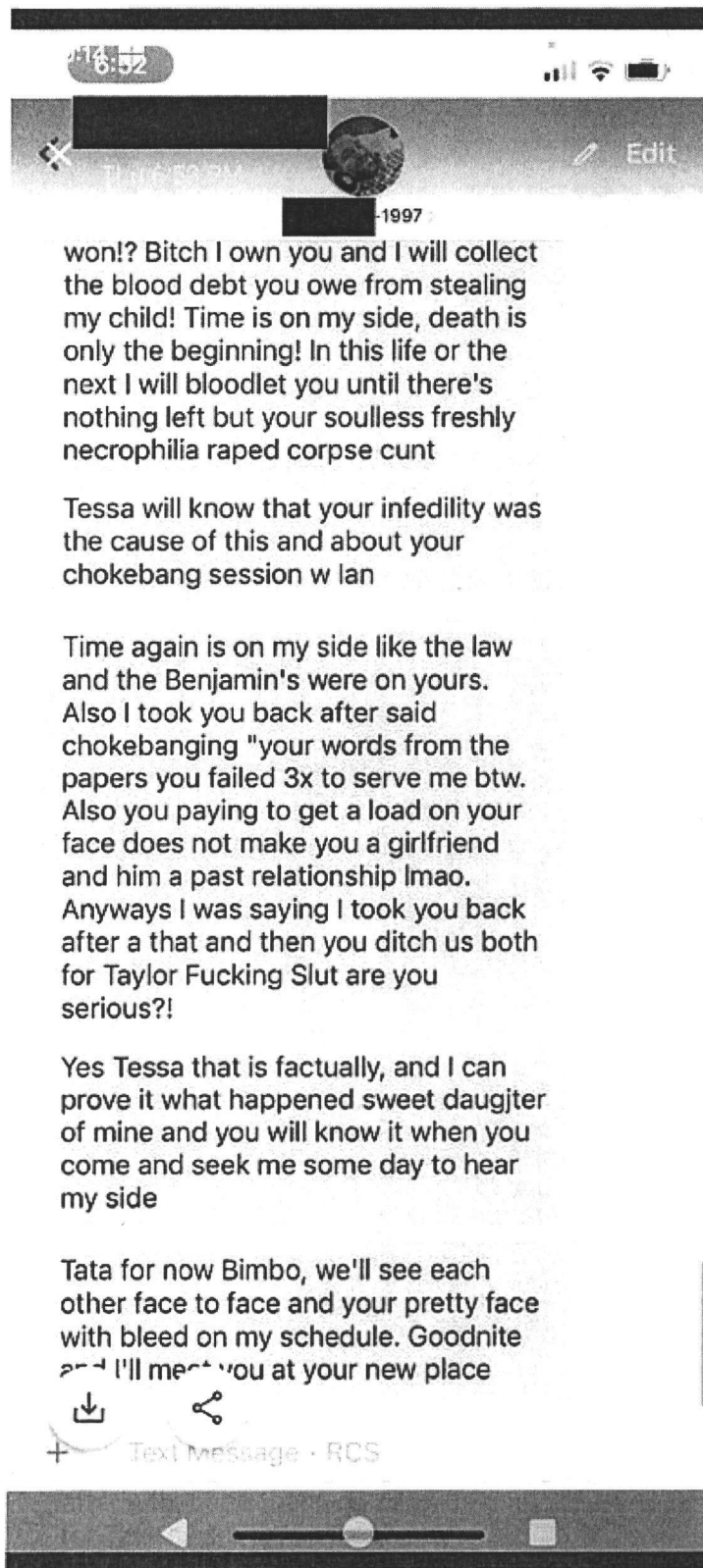
These voicemails were left by **Talbott** using his telephone number ending in 1997.

13. A.T. has indicated that she knows that **Talbott** has a car and a rifle.

Further, **Talbott** has threatened to come to A.T.'s school and church. A.T. is not allowed to take her students out for recess or go on field trips because of the threats.

14. On January 30, 2025, A.T. sent me a message stating **Talbott** began sending her text messages again. A.T. provided a screenshot of the message from **Talbott**. The screenshot of the message is below:

[the remainder of this page left intentionally blank]



CONCLUSION

Based on the foregoing, there is probable cause to believe that **Robert Earl Talbott** has used a facility of interstate commerce to stalk A.T., in violation of 18 U.S.C. § 2261A(2).



Daniel Berardicurti
Special Agent
Federal Bureau of Investigation

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1. on this 3rd day of February, 2025.



REBECCA RUTHERFORD
UNITED STATES MAGISTRATE JUDGE
NORTHERN DISTRICT OF TEXAS